

AL/AL/EN

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Garcia

ENBRIDGE™
Environmental, Health & Safety Dept.
2020 Bill Owens Parkway
Suite 100
Longview, TX 75604

Mr. John Blevins
U.S. EPA Region 6
Director, Compliance Assurance and Enforcement Division
1445 Ross Ave.
Dallas, Texas 75202

September 10, 2010

**RE: Administrative Compliance Order Docket No. CAA-06-2010-3313
Facility Registry System No. 110008165939
Enbridge Pipelines (East Texas) L.P.**

Mr. John Blevins:

In conformity with the Administrative Compliance Order received via electronic mail on August 27, 2010 Docket No. CAA-06-2010-3313, the "Order", please accept this letter as a reflection of Enbridge Pipelines (East Texas) L.P. "Enbridge" fulfillment of written certification of compliance.

Order Findings (4). On August 26, 2010, EPA investigators observed an unpermitted release of pollutants from a union joint at the expander unit and a fuel regulator at a Waukesha engine unit No. 4231 utilizing the FLIR® Gas Finder Infrared Camera.

Order Provisions (1). Fix, repair, or replace the leaking components that led to the unpermitted release of an extremely hazardous substance as described in paragraph four (4), upon receipt of this Order.

Order Provisions (2). Within fifteen (15) days of the effective date of this Order, Respondent shall provide written certification to the EPA, Region 6, that the activities required in the previous paragraph have been completed and shall include any supporting documents such as receipts and invoices. The written certification and supporting documentation shall be addressed to John Blevins, US EOA Region 6, Director Compliance Assurance and Enforcement Division, 1445 Ross Ave., Dallas, TX 75202. Respondent shall sign and certify under penalty of law that the certification and supporting documentation are true, accurate and not misleading.

Enbridge Response:

Order Provisions (1). Enbridge received the Order by e-mail notification on 8-27-10 and the hardcopy Order on 8-30-10. The first item concerning the union leak on the expander unit was tightened at the time of detection on 8/26/2010 by Mike Airheart and was retested by EPA inspectors prior to leaving the area and was found to be sealing properly. Therefore, this item was addressed before the official notification was received from the USEPA Region 6 investigation team and it was Enbridge's understanding at the time of repair that the item was considered complete at that time.

The second item identified was the fuel regulator located on the Waukesha compressor Unit No. 4231. Enbridge replaced the regulator on 9/1/10, identified as a KimRay regulator, at which point the component was leak checked. It was determined the KimRay regulator was leaking from the same point identified by USEPA. Enbridge directed an additional regulator be sourced to replace the replacement unit. Enbridge then installed the second regulator on 9/3/10 and found the same issue. The manufacturer was contacted and the third KimRay regulator was sent to the plant for installation on 9/8/10. Installation of the fourth KimRay was completed and the regulator was not leaking. Upon

further investigation Enbridge personnel confirmed via LEL meter that the regulator was leaking again at the same point. At that time, Enbridge contacted another manufacture and sourced a like kind replacement. This model regulator required additional installation support and was installed on 9/9/10. The new Fisher type 627 regulator was checked using an LEL meter to confirm the installation.

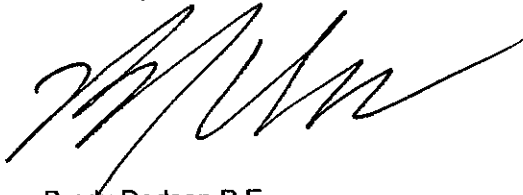
The third item identified by the USEPA investigation team, but not specifically referenced in the Order, was a packing leak identified at valve NV2. Enbridge replaced the packing in valve NV 2. Upon replacement of the packing the valve was checked using a LEL meter to confirm the repair.

The plant notification letter is attached detailing corrective actions taken to repair and replace the components outlined above. In this documentation the date and time of final corrective action is also recorded for your review. The invoice for the final regulator is also included for your review.

Order Provisions (2). Let this letter reflect compliance with written certification requirement and also, let it be known that;

"I certify that under the penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,



Brady Dodson P.E.
EH&S Manager - Gathering & Processing
Enbridge Energy

cc:

Charles Raiborn
District Manager - G&P North District
Enbridge Pipelines (East Texas) L.P.
2020 Bill Owens Parkway, Suite 100
Longview, TX. 75601

Trinidad Plant Files



**TRINIDAD PLANT
USEPA Region 6 Compliance Follow-Up**

To Mr. John Blevins
U.S. EPA Region 6
Director, Compliance Assurance
And Enforcement Division

The unpermitted releases of pollutants that EPA inspectors observed using a FLIR Gas Finder Infrared Camera on August 26 have been corrected.

Item 1. The Fuel regulator at Waukesha engine unit no. 4231 was replaced with a new style regulator (Invoice and delivery ticket are enclosed) by mechanics Dean Gauntt and Mike Airheart. Piping modifications were needed in the fuel loop to allow installation of the Fisher type 627 regulator that we chose to replace the Kimray regulator. Work was verified by checking with a BW gas alert max LEL meter. This work was complete on 9/9/2010 at 12:45PM.

Item 2. The stem packing leak on the regeneration gas flow control valve NV 2 was repacked on 9/1/2010 at 10:00AM using Orbit Valve stem packing GP-6 and verified by checking with a BW gas alert max LEL meter. The job was performed by plant mechanics Sam Ramsey and Mike Airheart.

Item 3. The union leak on the expander unit was tightened at the time of detection on 8/26/2010 by Mike Airheart and was retested by EPA inspectors prior to leaving the area and was found to be sealing properly.

Kennith Hunter
Trinidad Plant Supervisor

A handwritten signature in cursive script that reads 'Kennith Hunter'.

9/9/2010
Date

VINSON PROCESS CONTROLS

Pack List

Ship-To Address:

ENBRIDGE PIPELINE
720 LONE STAR ROAD
TRINIDAD TX 75163

Delivery No.

: 80280257

Date

: 09/08/2010

Vinson Order No.

: 320528

Purchase Order No.

: LOB# 93362

Incoterms

: Shipping Point / Charge

Payment Terms

: Net 30 Days

Bill-To Address:

ENBRIDGE PIPELINE (EAST TEXAS) L P
ATTN: ACCOUNTS PAYABLE
1100 LOUISIANA AVE #3400
HOUSTON TX 77002

Mark Packages:

LOB# 93362 KENNITH HUNTER/ SAM RAMSEY

Item	Material Cust. Material	Quantity	
010	28971 Item description: FS627-574 627-1217-29994 2" NPT FISHER TYPE 627 PRESSURE REGULATOR, DI BODY, 3/8" PORT, ALUM TRIM, 35-80 PSI RANGE Customer Tag Number: Notes:	1	EA
020	4745 Item description: Freight Charge Del (21) Customer Tag Number: Notes:	12.270	PU



Invoice
(COPY)

Invoice Number : 90410403
Invoice Date : 09/09/2010
Page : 2 of 2

Subtotal	452.19
Total	452.19

No credit allowed on returns without our permission.
Returns must be identified with our Return Authorization number.
Restocking charges may apply.

Remit to: P.O. Box 671389, Dallas, TX 75267-1389
Contact Vinson at (972) 459-8200

Please refer to our invoice number or return an invoice copy when remitting.
See our Terms and Conditions on the back of this invoice.



Invoice

(COPY)

Ship-To Address:

ENBRIDGE PIPELINE
720 LONE STAR ROAD
TRINIDAD TX 75163

Bill-To Address:

ENBRIDGE PIPELINE (EAST TEXAS) L P
ATTN: ACCOUNTS PAYABLE
1100 LOUISIANA AVE #3400
HOUSTON TX 77002

Sold-To Number : 217908
Invoice Number : 90410403
Invoice Date : 09/09/2010
Vinson Order No. : 320528
Vinson Order Dte : 09/08/2010
Customer PO No. : LOB# 93362
Terms of Pymnt : Net 30 Days
Delivery Terms : ZP1 Shipping Point / Charge
Page : 1 of 2 **PR1**
Ordered By : Kennith Hunter
Salesperson : Duke Nguyen

Marked Packages:

LOB# 93362 KENNITH HUNTER/ SAM RAMSEY

Notes:

Item#	Quantity	Material No. Cust. Mat. #	Unit Price	Ext. Price
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010	1	28971	439.92	439.92
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Plant: 0020 Dallas Distribution Center

Item Description:

2" NPT FISHER TYPE 627 PRESSURE
REGULATOR, DI BODY, 3/8" PORT, ALUM
TRIM, 35-80 PSI RANGE

Tag Number:

Notes:

Serial Number :

011	12.270	4745	1.00	12.27
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Plant: 0020 Dallas Distribution Center

Item Description:

Freight Charge Del (21)

Tag Number:

Notes:

Freight Tracking#: 1Z7501720363547360

Serial Number :